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In The United States District Court  
FOR The Northern District of Mississippi  
Greenville Division

Darren Lang, et al.

Plaintiffs

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NO: 4:20-CV-30-DMB-JMV

Jeworski Mallet, et al.

Defendants

MOTION FOR TRO/PRILIMINARY INJUNCTION

Comes now the Plaintiff Kedric F. Steele Class member in the above-entitled actions, and moves this COURT for an ORDER TRO/Preliminary Injunction. In support of this motion, the Plaintiff would show as follows. Pursuant to Rule 65(a)(6) Fed. R. Civ. P.

- 1.) Plaintiff submits On 11/30/21 at M.S.P. Unit 30 gym staff officer Micheal Honeycutt acting under Color of State law, unlawfully seized and confiscated Plaintiff's family value and personal property, Courts material and supplies necessary for his access to Courts. Without giving Plaintiff due process of M.D.O.C. policy and procedure to have his property

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put in a storage room or sent home.

- 2.) M.S.P. Staff Micheal Honeycutt force Plaintiff to throw his courts legal documents, supplies and personal family value things in the trash can.
- 3.) M.S.P. Staff Micheal Honeycutt was aggressive with verbal threats words against Plaintiff, Results in verbal assault.
- 4.) I, Plaintiff was mental frighten with shock and embarrass as been humiliated in front of other, staff, K-9 officials looking as well as other prisoners.
- 5.) Defendants M.S.P. Staff Micheal Honeycutt have a prison work record history of Verbal and Physical assaulting Prisoner's here at Parchman. The M.S.P. Superintendent, unit 30 wardens knows a bout this staff member unprofessional conduct and his assaults on prisoners. Failed to correct his actions.
- 6.) Plaintiff states he already have a (ARP) complaint pending against K-9 staff for excess force abuse.
- 7.) Defendants M.S.P. Staff Micheal Honeycutt acted intentionary or purposefully to deprive

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the plaintiff of his property rights. Staff Micheal Honeycutt abused his official power under color of state law or took unfair advantage of the Plaintiff. Staff Micheal Honeycutt acted reckless disregard of or with callous indifference to the plaintiff's property rights.

8.) Plaintiff's Constitutional Rights under the 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendment was violated by M.S.P. Staff officials.

A.) 4<sup>th</sup> no person shall have their property unlawful seized and destroyed without written compliance.

B.) 5<sup>th</sup>, 14<sup>th</sup> no person shall be deprived of property without due process of law.

C.) 8<sup>th</sup> no person shall be subjected to cruel and unusual punishment.

9.) Deprivation or limitation of property in retaliation for the exercise of constitutional rights is unconstitutional. (Bell v. Wolfish, 441 U.S. 555-55 (1979) Augustine v. Doc, 740 F.2d 322, 325-27 (5<sup>th</sup> Cir. 1984) Long v. Collins, 917 F.2d 3, 4 (5<sup>th</sup> Cir. 1990) Zineaman v Burch, 494 U.S. 113, 138 (1990))

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10.) The Constitution is the ultimate expression of the Public Interest. In this case, the grant of Relief will serve the public interest because it is always in the Public interest for Prison officials to obey the law, Respect for law, particularly by officials responsible for the administration of the state's correctional system, is in itself a matter of the highest Public interest.

11.) Prisoners will suffer "irreparable" injury without an injunction, Prisoners Constitutional Rights are likely to be violated is usually enough to meet the irreparable harm requirement. (see. Winter v. Natural Resources Defense Council, Inc, 129 S. Ct at 375 (2008))

Institutionalized Persons Prohibition of Retaliation 42 U.S.C.A. §1997d (1980)

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FOR the foregoing REASONS, the court  
should grant the Plaintiff motion in  
all respects.

PURSUANT to 28 U.S.C. 1746, I declare  
under penalty of perjury that the foregoing  
is true and correct.

Respectfully Submitted  
/s/ Kedie F Steele  
Plaintiff

Date: 12/1/21



## Certificate of Service

I, Kedric F. Steele do hereby certify that I have mailed a true, and correct copy of the foregoing motion for TRO Preliminary Injunction By placing in U.S. Mail, Postage Prepaid to the following individuals, address(s):

U.S. District Court, Clerk  
203 Githmore Drive  
Amory, MS 38821

Mississippi Attorney  
General  
P.O. Box 220  
Jackson, MS 39205

Marion Marvel Bradley  
Anderson + Tardy, LLC  
1020 Highland Colony Parkway  
Ridgeland, MS 39157

United States District Court  
Northern District of Miss  
Greenville Division  
305 Main Street  
Room 329  
Greenville, MS 38701

So Certified, this the 07 day of December 2021  
Kedric F. Steele  
Plaintiff

In The United States District Court  
For The Northern District of Mississippi  
Greenville Division

NO. 4:20-CV-30-DMB-JMV

Dear United States District Court  
~~Clark~~, I Am filing a Motion for TRO/  
Preliminary Injunction. Please file and  
send me a notice back. Thanks and May  
God Bless you and your family.

Respectfully Submitted  
Kedric F Steele  
M.S.P.  
30 B building Azura Bed #18  
P.O. Box 1057  
Parchman, MS 38738